

Exhibit “A”

Plaintiff's Complaint

1 COMP

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CASE NO: A-21-843817-C
Department 4

DISTRICT COURT

CLARK COUNTY, NEVADA

AISHEH SAYED-AHMAD, individually,

v.
Plaintiff,

CASE NO.
DEPT. NO.

SAM'S WEST, INC., a Delaware Corporation doing
business as SAM'S CLUB; DOES I - V; and ROE
CORPORATIONS, VI - X, inclusive,

COMPLAINT

Defendants.

Plaintiff complains as follows:

GENERAL ALLEGATIONS

1. The actions complained of herein occurred in Clark County, Nevada.
2. This Court has jurisdiction over this matter under NRS 14.065 and NRS 4.370(1) because the facts alleged occurred in Clark County, Nevada and involve an amount in controversy in excess of \$75,000.00. Venue is proper under NRS 13.040 because, upon information and belief, none of the Defendants resided in Clark County, Nevada at the commencement of this action.

3. Defendant Sam's West Inc. doing business as Sam's Club is, and at all times mentioned herein, was, a Delaware corporation, doing business in Clark County, State of Nevada.

4. The true names and capacities of the Defendants designated herein as Doe or Roe Corporations are presently unknown to Plaintiff at this time, who therefore sues said Defendants by such fictitious names. Upon information and belief, the Defendants designated as DOES and ROE CORPORATIONS operate the Sam's Club where Plaintiff slipped and fell and/or is the legal corporate name of Sam's Club. When the true names and capacities of these defendants are ascertained, Plaintiffs will amend

this Complaint accordingly.

5. The Defendants designated herein as DOE or ROE ENTITIES are the owners, operators, managers, controllers, designers, maintenance providers, and/or otherwise responsible for building and/or maintenance of the Subject Property.

6. At all times pertinent herein, Defendants were agents, servants, employees or joint venturers of every other Defendant, and at all times mentioned herein were acting within the scope and course of said agency, employment, or joint venture, with knowledge and permission and consent of all other named Defendants.

7. On November 15, 2019, Plaintiff was an invitee at Defendant Sam's Club property located at 7175 Spring Mountain Road, Las Vegas, Nevada (hereafter the "Location").

8. While at the Property, Plaintiff slipped on a liquid substance on the ground (hereafter the "dangerous condition"), causing Plaintiff to sustain serious injuries.

9. Defendants failed to display any warning signs as to the area's dangerous condition at the time of Plaintiff's fall.

10. Defendants should have warned or otherwise made safe the dangerous condition because that condition was non-obvious to Plaintiff.

11. Defendants negligently, carelessly, and recklessly maintained, constructed and allowed the dangerous condition to exist.

FIRST CAUSE OF ACTION

(Negligence)

12. Plaintiff incorporates paragraphs 1 through 11 of the Complaint as though said paragraphs were fully set forth herein.

13. Defendants owed Plaintiff a duty of care to maintain and inspect the location and keep it clean of debris and hazards.

14. Defendants owed Plaintiff a duty of care to warn Plaintiff of the non-obvious and dangerous condition.

15. Defendants breached that duty of care by failing to maintain and inspect the location, and failing to warn Plaintiff of its dangerous condition which was allowed to remain on the floor. Defendants

also breached its duty by maintaining a floor that lacked adequate slip resistant properties.

16. As a direct and proximate result of the negligence of Defendants, Plaintiff slipped and fell and has incurred medical bills in excess of \$75,000.00. Plaintiff's economic and non-economic damages exceed \$75,000.00.

WHEREFORE, Plaintiff expressly reserves the right to amend this complaint prior to or at the time of trial of this action, to insert those items of damage not yet fully ascertainable, prays judgment against all Defendants, and each of them, as follows:

1. For general damages in an amount in excess of \$75,000.00;
 2. For special damages in an amount in excess of \$75,000.00;
 3. For reasonable attorney's fees and costs;
 4. For interest at the statutory rate; and
 5. For such other relief as the Court deems just and proper.

BENSON ALLRED INJURY LAW

/s/ Joshua Benson
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